

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
Case No. 20-cv-954**

FARHAD AZIMA,

Plaintiff,

v.

NICHOLAS DEL ROSSO and VITAL
MANAGEMENT SERVICES, INC.,

Defendants.

**PLAINTIFF'S
MEMORANDUM IN SUPPORT
OF MOTION TO SEAL**

Plaintiff Farhad Azima hereby respectfully submits this Memorandum of Law in Support of his Motion to Seal the following documents: Plaintiff's Response to Defendants' Motion for Protective Order and Exhibits A-G to the Declaration of Randy Shepard. The material Plaintiff seeks to seal in the Response and Exhibits includes references to medical records, protected health information, and other protected information that has already been placed under seal by the Court, as well as other personal identifying information that is not of public record.

For the foregoing reasons, Plaintiff Farhad Azima respectfully requests that his Motion to Seal be granted, or in the alternative that he be given a reasonable time to attempt to redact any documents ordered by the Court to be redacted.

This, the 30th day of December, 2022.

WOMBLE BOND DICKINSON (US) LLP

/s/ Ripley Rand _____

Ripley Rand
North Carolina State Bar No. 22275
555 Fayetteville Street, Suite 1100
Raleigh, North Carolina 27602
Telephone: 919.755.8125
Fax: 919.755.6752
Email: ripley.rand@wbd-us.com

Counsel for Plaintiff

**IN THE UNITED STATES DISTRICT COURT
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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send electronic notification of this Notice, and sent copies of this Memorandum in Support of Motion to Seal via email, to the following attorneys:

Brandon S. Neuman, Esq.
Jeffrey M. Kelly, Esq.
Nathaniel J. Pencook, Esq.
301 Hillsborough Street
Suite 1400
Raleigh, NC 27603
brandon.neuman@nelsonmullins.com
jeff.kelly@nelsonmullins.com
nate.pencook@nelsonmullins.com
Telephone: 919.329.3800
Facsimile: 919.329.3799

This, the 30th day of December, 2022.

WOMBLE BOND DICKINSON (US) LLP

/s/ Ripley Rand

Ripley Rand
North Carolina State Bar No. 22275
555 Fayetteville Street, Suite 1100
Raleigh, NC 27601
Telephone: (919) 755-8125
Facsimile: (919) 755-6752
Email: ripley.rand@wbd-us.com

Counsel for Plaintiff